

HONORABLE TIMOTHY O. RICE

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

TIMOTHY BEUCA

Plaintiff,

v.

WASHINGTON STATE UNIVERSITY,  
DOES 1-50,

Defendants.

CASE NO. 2:23-cv-00069-TOR

**JOINT STATUS REPORT**

Plaintiff, Timothy Beuca, and Defendant, Washington State University, “WSU”, by and through undersigned counsel file this joint status report and accompanying stipulated motion and [proposed] Order in compliance with the Court’s Order, Dkt #16, dated September 16, 2024.

Pursuant to the Ninth Circuit Mandate issued on August 9, 2024 the parties request the case move forward by approving the filing of a Second Amended Complaint (“SAC”). The First Amendment was filed in Superior Court of Whitman County preceding removal to this Court.

Fed. R. Civ. P. 15(a)(2) allows filing of an amendment with the consent of the opposing party. In order to allow the case to proceed the parties, are stipulating and jointly proposing that

1 the Court approve the stipulated motion to file a Second Amended Complaint with redline version  
2 and order a clean version be filed thereafter and served on Defendants. Defendants response being  
3 due thirty (30) days after the filing of the SAC.

4  
5 DATED this 18th day of October, 2024.

6 Pacific Justice Institute

Pacifica Law Group

7 By s/Harold Franklin  
8 Harold Franklin, WSBA, #20486  
459 Seneca Ave. NW  
9 Renton, WA 98057  
206-617-7031  
10 haroldfranklin1@comcast.net  
11 *Attorneys for Plaintiff T. Beuca*

By s/ Zachary J. Pekelis  
Zachary J. Pekelis, WSBA #44557  
1191 2<sup>nd</sup> Ave. Ste. 2000  
Seattle, WA. 98101  
206-245-1700  
Zach.pekelis@pacificallawgroup.com  
*Attorney for Defendant WSU*

**ORDER**

IT IS SO ORDERED.

1. Plaintiff's shall file the SAC in accord with the Joint Stipulated Motion Order.
2. Defendants shall answer thirty (30) days after the filing of the SAC.
3. Parties shall, within 30 days after filing of Defendant's response to the SAC, file a joint proposed Motion and Order for the trial dates and case deadlines.

DONE IN OPEN COURT this \_\_\_\_ day of \_\_\_\_\_, 2024.

\_\_\_\_\_  
HON. TIMOTHY O. RICE

Presented by:

Pacific Justice Institute

Pacifica Law Group

By s/Harold Franklin  
Harold H. Franklin, Jr. WSBA  
#20486  
Pacific Justice Institute  
459 Seneca Ave. NW  
Renton, WA 98057  
haroldfranklin1@comcast.net  
Attorneys for Plaintiff

By /s/Zachary J. Pekalis  
Zachary J. Pekalis, WSBA, #44557  
1191 2<sup>nd</sup> Ave. Ste. 2000  
Seattle, WA. 98101  
(206)-245-1700  
Zach.pekelis@pacificlawgroup.com  
Attorneys for Defendant WSU

**CERTIFICATE OF SERVICE**

I hereby caused to be served a true and correct copy of the foregoing document by method indicated below and addressed to the following:

Zach Pekalis  
Pacifica Law Group  
1191 2<sup>nd</sup> Ave. Ste. 2000  
Seattle, WA 98101  
*Attorneys for Defendants*

*Delivery Via:*  
☐ U.S. Mail  
☐ Overnight Mail  
☐ Facsimile  
☐ E-Mail  
☒ CM/ECF

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 18<sup>th</sup> day of October, 2024, at Renton, WA.

PACIFIC JUSTICE INSTITUTE

s/ Harold H. Franklin, Jr  
WSBA #20486  
haroldfranklin1@comcast.net